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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SEP 21 2022

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SPOKANE, WASHINGTON

7 UNITED STATES DISTRICT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

2:22-CR-133-TOR

11 Plaintiff,
12 v.

INDICTMENT

13 ANDREA L. BREITHAUPT,
14 MICHELLE M. ZAT
15 (a/k/a "Shelley Zat"),
16 CHRYSTAL M. ZARATE-CRUZ
17 (a/k/a "Greenie"),
18 ALICIA A. LOPEZ,
19 SASHA M. BARAJAS,
20 BRITTNEY R. MORGAN,
21 SUSAN D. WILKINS
22 (a/k/a "Danny"),
23 JEROME L. MCCLELLAND,
24 ASHLEE M. MCELROY,
25 AUSTIN A. WUEST,
26 TERRI L. JACKSON,
27 STEVEN EVANS,
28 KACIE L. KLUNDT,
 KIMBERLEE S. KYLES,
 KRISTIE M. BLOCH,
 MARK A. PRESTON,
 SHEENA K. ELLER,
 PATRICK D. HUGHES,

18 U.S.C. § 1349
Conspiracy to Commit Bank
Fraud (Count 1)

18 U.S.C. § 1344(1), (2)
Bank Fraud
(Counts 2-88) *87*
wk 9/20/2022

18 U.S.C. § 982(a)(2), 28 U.S.C. §
2461 (c)
Forfeiture Allegations

1 MARCUS S. HAWKINS, and
 2 WILLIAM H. CAMERON

3 Defendants.
 4

5 The Grand Jury charges:
 6

GENERAL ALLEGATIONS

7 At all times relevant and material to this Indictment:

8 1. The term “financial institutions” refers collectively to the entities set
 9 forth below. “FDIC” denotes Federal Deposit Insurance Corporation. “NCUA”
 10 denotes National Credit Union Administration. Where account and card numbers
 11 are referenced within this Indictment, only the last four digits are provided.
 12

<u>NAME OF BANK</u>	<u>LOCATION OF SERVICE</u>	<u>FEDERAL INSURANCE</u>
Spokane Teachers Credit Union (STCU)	Washington (Including the Eastern District of Washington)	NCUA
Global Credit Union	Washington (Including Eastern District of Washington)	NCUA
Horizon Credit Union	Washington (Including Eastern District of Washington)	NCUA
Washington Trust Bank	Multi-State (Including Eastern District of Washington)	FDIC
Numerica Credit Union	Multi-State (Including Eastern District of Washington)	NCUA
Cheney Federal Credit Union	Washington (Including Eastern District of Washington)	NCUA

1	Mountain West Bank	Washington (Including Eastern District of Washington)	FDIC
2	Twin Star Credit Union	Washington (Including Eastern District of Washington)	NCUA
3	Idaho Central Credit Union	Idaho	NCUA
4	Navy Federal Credit Union	Multi-State (Including Eastern District of Washington)	NCUA
5	Georgia's Own Credit Union	Georgia	NCUA
6	Boeing Employees Credit Union	Multi-State (Including Eastern District of Washington)	NCUA
7	Banner Bank	Multi-State (Including Eastern District of Washington)	FDIC
8	Bank of America	National (Including Eastern District of Washington)	FDIC

15 2. The term "real person victims" refers collectively to individuals, including
 16 those identified below by initials and residence, whose means of identification and
 17 financial information and documents were possessed, transferred, and utilized
 18 without lawful authority.

<u>INITIALS OF REAL PERSON</u>	<u>RESIDENCE</u>
F.R.	Eastern District of Washington
P.D.M.	Eastern District of Washington
A.G.	Eastern District of Washington
W.J.	Eastern District of Washington
R.R & D.R.	Eastern District of Washington
D.N., K.N., & L.N.	Eastern District of Washington
S.S.	Eastern District of Washington
R.C.	Eastern District of Washington

1	T.T.	Eastern District of Washington
2	L.S.	Eastern District of Washington
3	R.H.	Eastern District of Washington
4	M.P.	Eastern District of Washington
5	F.K.	Eastern District of Washington
6	M.M.	Eastern District of Washington

8 3. The term “fictitious person” refers collectively to individuals, who did
 9 not exist and were made up to further the crimes committed during the alleged
 10 conspiracy in this Indictment where the following initials are found.

<u>FICTITIOUS PERSON</u>
Grace Knight
John Hancock

16 4. The term “organizational victims” refers collectively to the entities,
 17 including those identified below by name and location, whose bank account data
 18 and other identifying organizational information was possessed, transferred, and
 19 utilized without lawful authority.

<u>NAME OF ORGANIZATION</u>	<u>LOCATION</u>
Spokane County Clerk's Office	Eastern District of Washington
Spokane Tribe of Indians	Eastern District of Washington
All About Drywall	Eastern District of Washington
Career Path Services	Eastern District of Washington
Marks Construction	Eastern District of Washington

The Truss and Building Supply Co.	Western District of Washington
Pittsburgh Project LLC.	Pittsburgh, PA
Lauren C. Pendergraft Inc.	Spokane, WA

Overview of the Conspiracy

5. Beginning no later than on or about February 14, 2019, and continuing until at least on or about September 23, 2019, in the Eastern District of Washington, Defendants, ANDREA L. BREITHAUPT, MICHELLE M. ZAT (a/k/a "Shelley Zat"), BRITTNEY R. MORGAN, SASHA M. BARAJAS, JEROME L. MCCLELLAND, ALICIA A. LOPEZ, ASHLEE M. MCELROY, SUSAN D. WILKINS (a/k/a "Danny"), AUSTIN A. WUEST, TERRI L. JACKSON, STEVEN EVANS, KACIE L. KLUNDT, KIMBERLEE S. KYLES, KRISTIE M. BLOCH, MARK A. PRESTON, SHEENA K. ELLER, PATRICK D. HUGHES, MARCUS S. HAWKINS, CHRYSTAL M. ZARATE-CRUZ (a/k/a "Greenie"), and WILLIAM H. CAMERON did conspire to knowingly execute a scheme and artifice to defraud various financial institutions and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, and under the custody or control of financial institutions, by means of false or fraudulent pretenses, representations, or promises.

6. Defendants' fraudulent scheme included stealing checks from multiple sources; creating and/or altering checks and/or identification documents to obtain money from financial institutions, and opening accounts by depositing small amounts of money with financial institutions so they could fraudulently obtain more money by withdrawing substantially more money than they deposited from the financial institutions

1 7. In this manner, and as described further herein, Defendants
2 fraudulently obtained checks/securities for an amount of at least \$105,839.69 and
3 fraudulently sought at least \$192,020.80 before Defendants' fraudulent scheme was
4 uncovered.

COUNT 1

8. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 7 of the indictment as if fully set forth herein.

9. Beginning no later than on or about February 14, 2019, and continuing until at least on or about September 23, 2019, in the Eastern District of Washington, Defendants, ANDREA L. BREITHAUPT, MICHELLE M. ZAT (a/k/a “Shelley Zat”),, BRITTNEY R. MORGAN, SASHA M. BARAJAS, JEROME L. MCCLELLAND, ALICIA A. LOPEZ, ASHLEE M. MCELROY, SUSAN D. WILKINS (a/k/a “Danny”), AUSTIN A. WUEST, TERRI L. JACKSON, STEVEN EVANS, KACIE L. KLUNDT, KIMBERLEE S. KYLES, KRISTIE M. BLOCH, MARK A. PRESTON, SHEENA K. ELLER, PATRICK D. HUGHES, MARCUS S. HAWKINS, CHRYSTAL M. ZARATE-CRUZ (a/k/a “Greenie”), and WILLIAM H. CAMERON and other persons both known and unknown to the Grand Jury, did willfully, with intent to further the objects of the conspiracy, knowingly combine, conspire, confederate and agree together and with others known and unknown to the Grand Jury to knowingly and with intent to defraud, execute and cause the execution of a scheme and artifice to defraud one or more financial institutions, as defined by 18 U.S.C. § 20, which scheme and artifice would employ material falsehoods, to knowingly and with intent to defraud, execute, and cause the execution of a scheme and artifice to obtain moneys, funds, credits, assets, or other property owned by, and under the custody and control of, one or more financial

1 institutions, by means of false and fraudulent pretenses, representations, or
2 promises relating to a material fact, in violation of 18 U.S.C. §§ 1349,
3 1344(1) and (2).

4 **PURPOSE OF THE CONSPIRACY**

5 10. It was the purpose of the conspiracy for Defendants to unlawfully
6 enrich themselves and their co-conspirators by, among other things: (a)
7 unlawfully obtaining financial institution account data, including checks,
8 credit cards and credit card accounts, and identifying information of a real
9 person, including forms of identification that had been issued to real person
10 victims; (b) creating counterfeit and false driver's licenses and identification
11 cards to use as personal identification when negotiating actual, forged, and
12 counterfeit checks; (c) creating forged, altered, and counterfeit checks; (d)
13 recruiting and using check runners to negotiate forged, altered, and counterfeit
14 checks at various locations; (e) causing forged, altered, and counterfeit checks
15 to be presented for payment by financial institutions based on material
16 misrepresentations; (f) unlawfully using forged, altered, and counterfeit
17 checks for payment for goods based on material misrepresentations; and (g)
18 unlawfully using means of identification of real person victims and others, in
19 order in order to conceal Defendants' and their co-conspirators' involvement in
20 the fraud scheme.

21 **WAYS, MANNERS, AND MEANS OF THE CONSPIRACY**

22 11. The manner and means by which Defendants sought to
23 accomplish the objects and purpose of the conspiracy included, among others,
24 the following:

Obtaining Bona Fide Victim Information

12. Beginning no later than on or about February 14, 2019, and continuing until at least on or about September 23, 2019, in the Eastern District of Washington, Defendants unlawfully obtained financial and personal identifying information, including names, addresses, social security numbers, and banking and account information of real person victims. Defendants obtained that information from various sources, but primarily through the theft of mail.

Forging, Altering, and Counterfeiting Checks

13. Defendants falsely and fraudulently altered stolen checks to make them payable to themselves and their co-conspirators and created, and caused to be created, forged and counterfeit checks, and negotiated and attempted to negotiate such checks for their own use and benefit and in furtherance of the conspiracy.

Use of Bank Accounts

14. Defendants also used and attempted to use fraudulently opened consumer accounts at financial institutions in the name of real person victims, for Defendants' use and benefit and in furtherance of the conspiracy.

COUNTS 2 through 87

15. Paragraphs 1 through 14 of this Indictment are re-alleged and fully incorporated herein by reference.

16. Beginning no later than on or about February 14, 2019, and continuing until at least about September 23, 2019, in the Eastern District of Washington, ANDREA L. BREITHAUPT, MICHELLE M. ZAT (a/k/a "Shelley Zat"), BRITTNEY R. MORGAN, SASHA M. BARAJAS, JEROME L. MCCLELLAND, ALICIA A. LOPEZ, ASHLEE M. MCELROY, SUSAN D. WILKINS (a/k/a "Danny"), AUSTIN A. WUEST, TERRI L. JACKSON,

1 STEVEN EVANS, KACIE L. KLUNDT, KIMBERLEE S. KYLES, KRISTIE M.
 2 BLOCH, MARK A. PRESTON, SHEENA K. ELLER, PATRICK D. HUGHES,
 3 MARCUS S. HAWKINS, CHRYSTAL M. ZARATE-CRUZ (a/k/a "Greenie"),
 4 and WILLIAM H. CAMERON, knowingly executed a scheme or artifice to
 5 defraud various financial institutions, and to obtain any of the moneys, funds,
 6 credits assets, securities, and other property owned by, and under the custody or
 7 control of financial institutions, by means of false or fraudulent pretenses,
 8 representations, or promises, in violation of 18 U.S.C. § 1344(1), (2).

9 *Execution of Bank Fraud and Artifice*

10 17. On or about the dates specified as to each count below, in the Eastern
 11 District of Washington, the defendants specified as to each count below did
 12 execute and attempt to execute, and cause the execution of, a scheme and artifice
 13 to defraud financial institutions, as defined by 18 U.S.C. § 20, which scheme and
 14 artifice employed material falsehoods, and did knowingly, and with the intent to
 15 defraud, execute, attempt to execute, and cause the execution of, a scheme and
 16 artifice to obtain moneys, funds, credits, assets, and other property
 17 owned by, and under the custody and control of, financial institutions by means of
 18 false and fraudulent pretences, representations, and promises, as more particularly
 19 described below:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT(S)</u>	<u>EXECUTION</u>
2	February 14, 2019	MORGAN, BREITHAUPT	Negotiated stolen and fraudulently altered check (no. 92797) imprinted as the account of 'Career Path Services' in the amount of \$997.54, deposited into Defendant MORGAN's Horizon Credit Union account in Spokane County, WA, via mobile deposit.

1	3	February 15, 2019	MORGAN, BREITHAUPT	Negotiated stolen and fraudulently altered check (no. 4437085) imprinted as the account of 'John Hancock' in the amount of \$528.54, deposited via mobile deposit into Defendant MORGAN's Horizon Credit Union account located in Spokane County, WA.
8	4	March 15, 2019	ZAT, BREITHAUPT	Negotiated stolen and fraudulently altered check imprinted as the account of 'All About Drywall' (no. 71333) in the amount of \$987.34, deposited into Defendant ZAT's account at Cheney Federal Credit Union located in Spokane County, WA.
15	5	March 15, 2019	MORGAN, BREITHAUPT, ZAT	Negotiated stolen and fraudulently altered check (no. 71330) imprinted as the account of 'All About Drywall' in the amount of \$981.49, made payable to Defendant ZAT and deposited into Defendant MORGAN's Numerica Credit Union account located in Spokane County, WA.
22	6	April 5, 2019	MCCLELLAND, MORGAN, BREITHAUPT	Negotiated stolen and fraudulently altered check (no. 53854) check imprinted as the account of 'P. D. M.' in the amount of \$983.99 and deposited to Defendant MCCLELLAND's account at Washington Trust Bank located in Spokane County, WA.

1	7	April 6, 2019	BARAJAS, BREITHAUPT	Negotiated stolen and fraudulently altered check (no.323411) imprinted as the account of 'Spokane County Clerk's Office' in the amount of \$893.98, deposited into Defendant BARAJAS' Horizon Credit Union account located in Spokane County, WA.
2	8	April 6, 2019	BARAJAS, BREITHAUPT	Negotiated stolen and fraudulently altered check (no. 12098) imprinted as the account of 'Kyotoa Longview Inc.' made payable to F.K. in the amount of \$590.34, deposited into Defendant BARAJAS' Horizon Credit Union account located in Spokane County, WA.
3	9	April 8, 2019	BARAJAS, BREITHAUPT	Negotiated stolen and fraudulently altered check (no.71341) imprinted as the 'All About Drywall' in the amount of \$1995.34, cashed at Horizon Credit Union in Moses Lake on Defendant BARAJAS' Horizon Credit Union account located in Spokane County, WA.
4	10	April 8, 2019	BARAJAS, BREITHAUPT	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2121) imprinted as the account of 'F.R.' in the amount of \$285.56 made payable to Defendant BARAJAS, deposited at STCU into BARAJAS' Horizon Credit Union account located in Spokane County, WA.

1 2 3 4 5 6 7	11	April 8, 2019	BARAJAS, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2142) imprinted as the account of 'F.R.' in the amount of \$400.00, deposited at Spokane Teacher's Credit Union into Defendant BARAJAS' Horizon Credit Union account located in Spokane County, WA
8 9 10 11 12 13 14 15	12	April 8, 2019	BARAJAS, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2120) imprinted as the account of 'F.R.' in the amount of \$384.26 made payable to Defendant BARAJAS, deposited at STCU into Defendant BARAJAS' Horizon Credit Union account located in Spokane County, WA
16 17 18 19 20 21 22	13	April 11, 2019	BARAJAS, BREITHAUPt	Negotiated stolen and fraudulently altered check (no. 93664) imprinted as the account of 'The Truss and Building Supply Co.' in the amount of \$984.92, deposited at STCU into Defendant BARAJAS' Horizon Credit Union account located in Spokane County, WA.
23 24 25 26 27 28	14	May 9, 2019	WILKINS, BREITHAUPt	Negotiated stolen and fraudulently altered check (no. 71342) imprinted as 'All About Drywall' in the amount of \$585.44, deposited into Defendant WILKINS' STCU account located in Spokane County, WA.

1 2 3 4 5	15	May 9, 2019	WILKINS, BREITHAUPt	Use of Defendant WILKINS' STCU debit card and PIN to make a fraudulent withdrawal in the amount of \$500.00 at a STCU ATM located in Spokane County, WA.
6 7 8 9 10 11	16	May 10, 2019	WILKINS, BREITHAUPt	Negotiated stolen and fraudulently altered 'MRK Construction' check (no. 1814) in the amount of \$1,024.89, deposited in Defendant WILKINS' Numerica Credit Union account at a Global Credit Union ATM located in Spokane County, WA.
12 13 14 15 16 17 18 19 20	17	May 12, 2019	WILKINS, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2194) imprinted as the account of 'F.R.' in the amount of \$1,002 made payable to Defendant WILKINS, deposited into Defendant WILKINS' Numerica Credit Union account at a Numerica Credit Union ATM located in Spokane County, WA.
21 22 23 24 25 26 27 28	18	May 13, 2019	WILKINS, BREITHAUPt	Negotiated stolen and fraudulently altered check (no. 71343) imprinted as the account of 'All About Drywall' in the amount of \$1,004.89, deposited via mobile deposit into Defendant WILKINS' Numerica Credit Union account located in Spokane County, WA.

1 2 3 4 5 6 7	19	May 13, 2019	WILKINS, BREITHAUPT, ZAT	Negotiated stolen and fraudulently altered ‘Georgia’s Own Credit Union’ check (no. 52253) in the amount of \$1,025.00 made payable to Defendant ZAT, deposited via an ATM into WILKINS’ Numerica Credit Union account located in Spokane County, WA.
8 9 10 11 12 13 14	20	May 21, 2019	MORGAN, MCCELLAND, BREITHAUPT	Attempted to cash negotiated stolen and fraudulently altered Banner Bank check (no. 5286) imprinted as the account of ‘D.N., K.N. & L.N.’ in the amount of \$500.00, made payable to Defendant MORGAN at Mountain West Bank, located in Spokane County, WA.
15 16 17 18 19 20 21 22	21	June 1, 2019	BREITHAUPT	Negotiated stolen and fraudulently altered Boeing Employees Credit Union check (no. 1818) imprinted as ‘MRK Construction’ in the amount of \$1,026.89 made payable to T.T., deposited via mobile deposit into T.T.’s STCU account located in Spokane County, WA.
23 24 25 26 27 28	22	June 1, 2019	BREITHAUPT	Negotiated stolen and fraudulently altered Navy Federal Credit Union check (no. 10028) imprinted as the account of ‘Pittsburgh Project LLC’ in the amount of \$582.34 made payable to T.T., deposited via mobile deposit into T.T.’s.

			STCU account located in Spokane County, WA.
23	June 1, 2019	BREITHAUPT	Use of T.T.'s Debit Card PIN without authority to make a fraudulent withdrawal from T.T.'s STCU account in the amount of \$202.50 at Washington Trust Bank in Spokane County, WA.
24	June 1, 2019	BREITHAUPT	Use of T.T.'s Debit Card PIN without authority to make a fraudulent withdrawal from T.T.'s STCU account in the amount of \$502.50 at Washington Trust Bank in Spokane County, WA.
25	June 9, 2019	BREITHAUPT	Negotiated stolen and fraudulently altered Cheney Federal Credit Union check (no. 5205) imprinted as the account of 'D.N., K.N. & L.N.' in the amount of \$500.00 made payable to S.S., deposited into S.S.'s STCU account at a STCU ATM located in Spokane County, WA.
26	June 10, 2019	BREITHAUPT	Negotiated stolen and fraudulently altered Cheney Federal Credit Union check (no. 5209) imprinted as the account of 'D.N., K.N., & L.N.' in the amount of \$520.00 made payable to S. S., deposited via mobile deposit into S. S.'s Spokane Teachers Credit Account located in Spokane County, WA.

1 2 3 4 5 6 7 8	27	July 11, 2019	ZAT, LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3026) imprinted as the account of 'R. C.' in the amount of \$585.65 made payable to Defendant LOPEZ was deposited into Defendant LOPEZ's STCU bank account at a STCU ATM located in Spokane County, WA.
9 10 11 12 13 14 15 16 17	28	July 11, 2019	ZAT, LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3028) imprinted as the account of 'R. C.' in the amount of \$585.65 made payable to Defendant LOPEZ. and deposited, via mobile deposit, into Defendant LOPEZ'S STCU account at a STCU ATM located in Spokane County, WA.
18 19 20 21 22 23 24 25 26 27 28	29	June 20, 2019	ZAT, MCELROY	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 1044) imprinted as the account of 'W. J.' in the amount of \$684.00 made payable to Defendant MCELROY, deposited via mobile deposit into Defendant MCELROY's STCU Account located in Spokane County, WA.
	30	June 20, 2019	ZAT, MCELROY	Negotiated a stolen and fraudulently altered Numerica Credit Union check (no. 1048) imprinted as the account of 'W.J.' in the amount of \$768.54

			made payable to Defendant MCELROY, deposited into Defendant MCELROY's STCU Account at a Numerica Credit Union ATM located in Spokane County, WA.
31	June 21, 2019	ZAT, MCELROY	Negotiated stolen and fraudulently altered Banner Bank check (no. 2300) imprinted as the account of 'R.R & D.R.' in the amount of \$556.37 made payable to Defendant MCELROY, deposited via mobile deposit into Defendant MCERLROY's STCU account located in Spokane County, WA.
32	June 21, 2019	ZAT, MCELROY	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 1045) imprinted as the account of 'W.J.' in the amount of \$745.00 made payable to Defendant MCELROY, deposited into Defendant MCERLROY's STCU account at a STCU ATM located in Spokane County, WA.
33	June 26, 2019	HUGHES, BREITHAUPt	Used Defendant HUGHES' fraudulent Idaho Central Credit Union (ICCU) account and ICCU Debit Card to make fraudulent withdrawals and transfers totaling a loss of approximately \$1,800 on Defendant HUGHES' ICCU account in Spokane County, WA.

1 2 3 4 5 6	34	June 28, 2019	KYLES, BREITHAUPt	Used Defendant KYLES' fraudulent ICCU account and ICCU Debit Card to make fraudulent withdrawals and transfers totaling a loss of approximately \$800.00 on KYLES' ICCU account in Spokane County, WA.
7 8 9 10 11 12 13 14 15	35	June 29, 2019	ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 1795) imprinted as the account of 'Lauren C. Pendergraft Inc.' in the amount of \$962.44 made payable to A.G., deposited at Numerica Credit Union located in Spokane County, WA. into A.G.'s STCU Credit Union account located in Spokane County, WA.
16 17 18 19	36	June 30, 2019	ZAT, BREITHAUPt	Use of A.G.'s Mastercard Debit Card PIN without authority to make a fraudulent withdrawal in the amount of \$500.00 at a Numerica Credit Union located in Spokane County, WA.
20 21 22 23 24 25 26 27 28	37	June 30, 2019	ZAT, BREITHAUPt	Use of A.G.'s Mastercard Debit Card PIN without authority to make a fraudulent withdrawal in the amount of \$500.00 at a Numerica Credit Union located in Spokane County, WA.
	38	June 30, 2019	ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Washington Trust check (no. 58419) imprinted as the account of 'Colvico Inc' in the amount of \$511.23 made payable to A.G. was deposited at Numerica

			Credit Union located in Spokane County, WA, into A.G.'s STCU account located in Spokane County, WA
39	July 9, 2019	JACKSON, BREITHAUPT	In Spokane County, WA, used Defendant JACKSON'S fraudulent ICCU account and ICCU Debit Card to make fraudulent withdrawals and transfers totaling a loss of approximately \$1,700.00 on Defendant JACKSON'S ICCU account.
40	July 13, 2019	LOPEZ, BREITHAUPT	Negotiated stolen and fraudulently altered Bank of America check (no. 3037) imprinted as the account of 'R.C.' in the amount of \$1,000.00 made payable to Defendant LOPEZ was deposited into Defendant LOPEZ's Numerica Credit Union account via ATM deposit at a Numerica Credit Union located in Spokane County, WA.
41	July 15, 2019	LOPEZ, BREITHAUPT	In Spokane County, WA used Defendant LOPEZ'S fraudulent ICCU account and ICCU Debit Card to make fraudulent withdrawals and transfers totaling a loss of approximately \$4,200.00 on Defendant LOPEZ's ICCU account.
42	July 15, 2019	LOPEZ, BREITHAUPT	Negotiated stolen and fraudulently altered Bank of America check (no. 3035) imprinted as the account of

			'R.C.' in the amount of \$1,000.00 made payable to Defendant LOPEZ, deposited via mobile deposit into Defendant LOPEZ's Numerica Credit Union account located in Spokane County, WA.
43	July 15, 2019	LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3022) imprinted as the account of 'R.C.' in the amount of \$1,000.00 made payable to Defendant LOPEZ, deposited via mobile deposit into Defendant LOPEZ's Numerica Credit Union account located in Spokane County, WA.
44	July 15, 2019	LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3023) imprinted as the account of 'R.C.' in the amount of \$912.00 made payable to Defendant LOPEZ, deposited via mobile deposit into Defendant LOPEZ's Numerica Credit Union account located in Spokane County, WA.
45	July 15, 2019	LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3030) imprinted as the account of 'R.C.' in the amount of \$1,010.00 made payable to Defendant LOPEZ, deposited into Defendant LOPEZ's Numerica Credit Union account via ATM deposit at Numerica

			Credit Union located in Spokane County, WA.
46	July 15, 2019	LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3031) imprinted as the account of 'R.C.' in the amount of \$1,000.00 made payable to Defendant LOPEZ, deposited, via mobile deposit, into Defendant LOPEZ's Numerica Credit Union account located in Spokane County, WA.
47	July 15, 2019	LOPEZ, BREITHAUPt	Negotiated stolen and fraudulently altered Bank of America check (no. 3033) imprinted as the account of 'R.C.' in the amount of \$1,412.00 made payable to Defendant LOPEZ, deposited, via mobile deposit, into Defendant LOPEZ's Numerica Credit Union account located in Spokane County, WA.
48	July 17, 2019	EVANS, ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2152) imprinted as the account of 'F.R.' in the amount of \$552.84 made payable to Defendant EVANS, deposited, via mobile deposit, into Defendant EVANS' STCU account located in Spokane County, WA.
49	July 17, 2019	EVANS, ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2153)

			imprinted as the account of 'F.R.' in the amount of \$1,010.00 made payable to Defendant EVANS, deposited, via mobile deposit, into Defendant EVANS' STCU account located in Spokane County, WA.
50	July 18, 2019	EVANS, ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2154) imprinted as the account of 'F.R.' in the amount of \$1,122.84 made payable to Defendant EVANS, deposited into Defendant EVANS' STCU account at an ATM located at Numerica Credit Union in Spokane County, WA.
51	July 18, 2019	EVANS, ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2155) imprinted as the account of 'F.R.' in the amount of \$760.00 made payable to Defendant EVANS, deposited, via mobile deposit, into Defendant EVANS' STCU account located in Spokane County, WA.
52	July 18, 2019	EVANS, ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2156) imprinted as the account of 'F.R.' in the amount of \$654.00 made payable to Defendant EVANS, deposited into Defendant EVANS' STCU account at a STCU ATM

			located in Spokane County, WA.
53	July 18, 2019	EVANS, ZAT, BREITHAUPT	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2157) imprinted as the account of 'F.R.' in the amount of \$526.00 made payable to Defendant EVANS, deposited, via mobile deposit, into EVANS' STCU account, located in Spokane County, WA.
54	July 19, 2019	KLUNDT, BREITHAUPT	In Spokane County, WA, used Defendant KLUNDT'S fraudulent ICCU account and ICCU Debit Card to make fraudulent withdrawals and transfers totaling a loss of Approximately \$6,000.00 on Defendant KLUNDT'S ICCU account.
55	July 26, 2019	ELLER, BREITHAUPT	Negotiated stolen and fraudulently altered Numerica Credit Union check (no. 2250) imprinted as the account of 'F.R.' in the amount of \$1,000.00 made payable to Defendant ELLER, deposited, via mobile deposit, into Defendant ELLER'S Numerica Credit Union account located in Spokane County, WA.
56	July 26, 2019	ELLER, BREITHAUPT	Negotiated stolen and fraudulently altered US Bank check (no. 17532) imprinted 'Pittsburgh Project LLC' in the amount of \$1,000.00 made payable to Defendant ELLER and deposited into Defendant

			ELLER'S Numerica Credit Union account located in Spokane County, WA.
57	July 26, 2019	ELLER, BREITHAUPT	Negotiated stolen and fraudulently altered US Bank check (no. 17531) imprinted 'Pittsburgh Project LLC' in the amount of \$1,033.34 made payable to Defendant ELLER and deposited into Defendant ELLER'S Numerica Credit Union account located in Spokane County, WA.
58	July 29, 2019	ELLER, BREITHAUPT	Negotiated stolen and fraudulently altered Boeing Employees Credit Union check (no. 2020) imprinted as 'Marks Construction' in the amount of \$1,098.23 made payable to Defendant ELLER and deposited into Defendant ELLER'S Numerica Credit Union account located in Spokane County, WA.
59	July 29, 2019	ELLER, BREITHAUPT	Negotiated stolen and fraudulently altered Boeing Employees Credit Union check (no. 2021) imprinted as 'Marks Construction' in the amount of \$1,000.00 made payable to Defendant ELLER and deposited into Defendant ELLER'S Numerica Credit Union account located in Spokane County, WA.
60	July 29, 2019	ELLER, BREITHAUPT	Negotiated stolen and fraudulently altered Banner Bank check (no. 2294) imprinted as the account of

			'R.R & D.R.' in the amount of \$846.26 made payable to Defendant ELLER and deposited into Defendant ELLER's Numerica Credit Union account located in Spokane County, WA.
61	July 30, 2019	WILKINS, BREITHAUPt	Used Defendant WILKINS' fraudulent ICCU account and ICCU Debit Card to make fraudulent withdrawals and transfers totaling a loss of approximately \$6,000.00 on Defendant WILKINS' ICCU account in Spokane County, WA.
62	July 31, 2019	PRESTON, ZAT	Negotiated stolen and fraudulently altered ICCU check (no. 1501) imprinted as 'KYLES' in the amount of \$740.00 made payable to Defendant PRESTON and deposited, via mobile deposit, into Defendant PRESTON'S STCU account located in Spokane County, WA.
63	July 31, 2019	PRESTON, ZAT	Use of Defendant PRESTON'S STCU Debit Card PIN to make a fraudulent withdrawal from Defendant PRESTON's STCU account in the amount of \$500.00 at a STCU ATM located in Spokane County, WA.
64	August 1, 2019	PRESTON, ZAT, KYLES	Negotiated stolen and fraudulently altered ICCU check (no. 1503) imprinted as the account of 'KYLES' in the amount of \$692.84 made

			payable to Defendant PRESTON was deposited via mobile deposit into Defendant PRESTON'S STCU account located in Spokane County, WA.
65	August 1, 2019	PRESTON, ZAT	Use of Defendant PRESTON'S STCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$500.00 at an ATM located in Spokane County, WA.
66	August 2, 2019	ZAT, BREITHAUPt	Used Twin Star Visa credit card ending in 0898 without authority to make a cash advance in the amount of \$203.95 at an ATM located in Spokane County, WA.
67	August 13, 2019	WUEST, HAWKINS, MORGAN, BREITHAUPt	Use of Defendant WUEST'S ICCU Debit Card PIN to make a fraudulent purchase in the amount of \$121.70 at a Wal-Mart located in Spokane County, WA.
68	August 13, 2019	WUEST, HAWKINS, MORGAN, BREITHAUPt	Use of Defendant WUEST'S ICCU Debit Card to make a fraudulent purchase in the amount of \$841.27 at a Wal-Mart located in Spokane County, WA.
69	August 13, 2019	WUEST, HAWKINS, MORGAN, BREITHAUPt	Use of Defendant WUEST'S ICCU Debit Card to make a fraudulent purchase in the amount of \$101.08 at a Wal-Mart located in Spokane County, WA.
70	August 13, 2019	WUEST, HAWKINS, MORGAN,	Use of Defendant WUEST'S ICCU Debit Card to make a fraudulent purchase in the

		BREITHAUPt	amount of \$103.23 at a Wal-Mart located in Spokane County, WA.
71	August 27, 2019	WILKINS, CAMERON, ZAT, BREITHAUPt	Use of Defendant CAMERON'S ICCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$503.00 at the Spokane Tribe Casino cage located in Spokane County, WA.
72	August 27, 2019	WILKINS, CAMERON, ZAT, BREITHAUPt	Use of Defendant CAMERON'S ICCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$1,854.00 at the Spokane Tribe Casino cage located in Spokane County, WA.
73	August 27, 2019	WILKINS, CAMERON, ZAT, BREITHAUPt	Use of Defendant CAMERON'S ICCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$2,472.00 at the Spokane Tribe Casino cage located in Spokane County, WA.
74	August 27, 2019	ZARATE-CRUZ, ZAT, BREITHAUPt	Use of Defendant ZARATE-CRUZ'S ICCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$2,400.00 at a Chase Bank located in Spokane County, WA.
75	August 27, 2019	ZARATE-CRUZ, ZAT, BREITHAUPt	Use of Defendant ZARATE-CRUZ'S ICCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$2,472.00 at the Spokane Tribe Casino cage located in Spokane County, WA.

1	76	August 27, 2019	ZARATE-CRUZ, ZAT, BREITHAUPt	Use of Defendant ZARATE-CRUZ'S ICCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$2,472.00 at the Spokane Tribe Casino cage located in Spokane County, WA.
6	77	August 28, 2019	ZARATE-CRUZ, ZAT	Use of Defendant ZARATE-CRUZ'S ICCU Debit Card to make a fraudulent purchase in the amount of \$951.15 at a Wal-Mart located in Spokane County, WA.
10	78	August 28, 2019	ZARATE-CRUZ, ZAT	Use of Defendant ZARATE-CRUZ'S ICCU Debit Card to make a fraudulent purchase in the amount of \$745.95 at a Wal-Mart located in Spokane County, WA.
15	79	August 28, 2019	ZARATE-CRUZ, ZAT	Use of Defendant ZARATE-CRUZ'S ICCU Debit Card to make a fraudulent purchase in the amount of \$208.01 at a Wal-Mart located in Spokane County, WA.
19	80	September 2, 2019	ZAT, BREITHAUPt, BLOCH	Negotiated stolen and fraudulently altered Wells Fargo check (no. 2003) imprinted as the account of 'M.M.' in the amount of \$1,500.00 made payable to M.P. was deposited via mobile deposit into M.P.'s STCU account located in Spokane County, WA.
26	81	September 22, 2019	ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Wells Fargo check (no. 2002) imprinted as the account of

			‘M.M.’ in the amount of \$2,850.00 made payable to M.P. and fraudulently endorsed by Defendant ZAT, deposited via mobile deposit into M.P.’s STCU account located in Spokane County, WA.
82	September 22, 2019	ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Wells Fargo check (no. 2015) imprinted as the account of ‘M.M.’ in the amount of \$1,000.00 made payable to M.P. and fraudulently endorsed by Defendant ZAT, deposited via mobile deposit into M.P.’s STCU account located in Spokane County, WA.
83	September 22, 2019	ZAT, BREITHAUPt	Negotiated stolen and fraudulently altered Wells Fargo check (no. 2017) imprinted as the account of ‘M.M.’ in the amount of \$611.03, deposited, via mobile deposit, into M. P.’s STCU account located in Spokane County, WA.
84	September 23, 2019	BREITHAUPt	Negotiated stolen and fraudulently altered Wells Fargo check (no. 197) imprinted as the account of ‘L.S.’ in the amount of \$584.26 made payable to R.H., deposited via mobile deposit into R.H.’s STCU account ending in 2659, located in Spokane County, WA.

1	85	September 23, 2019	BLOCH, BREITHAUPT	Negotiated stolen and fraudulently altered Wells Fargo check (no. 100) imprinted as the account of 'Michelle ZAT' in the amount of \$750.00, deposited into Defendant BLOCH'S STCU account at a Numerica Credit Union ATM located in Spokane County, WA.
8	86	September 23, 2019	BLOCH, BREITHAUPT	Use of Defendant BLOCH'S STCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$500.00 at a Numerica Credit Union ATM located in Spokane County, WA.
13	87	September 23, 2019	BLOCH, BREITHAUPT	Use of Defendant BLOCH'S STCU Debit Card PIN to make a fraudulent withdrawal in the amount of \$220.00 at a Numerica Credit Union ATM located in Spokane County, WA.

18 All in violation of 18 U.S.C. § 1344(1), (2), and 18 U.S.C. § 2.

19 NOTICE OF CRIMINAL FORFEITURE

20 The allegations contained in this Indictment are hereby realleged and
21 incorporated by reference for the purpose of alleging forfeitures.
22

23 Bank Fraud

24 Pursuant to 18 U.S.C. § 982(a)(2)(A), upon conviction of the offense in
25 violation of 18 U.S.C. §§ 1344, 1349, Conspiracy to Commit Bank Fraud and
26 Bank Fraud, as set forth in this Indictment, the Defendants, ANDREA L.
27 BREITHAUPT, MICHELLE M. ZAT (a/k/a "Shelley Zat"), CHRYSTAL M.
28 ZARATE-CRUZ (a/k/a "Greenie"), ALICIA A. LOPEZ, SASHA M. BARAJAS,

1 BRITTNEY MORGAN, SUSAN WILKINS (a/k/a "Danny"), JEROME L.
2 MCCLELLAND, ASHLEE M. MCELROY, AUSTIN A. WUEST, TERRI L.
3 JACKSON, STEVEN EVANS, KACIE L. KLUNDT, KIMBERLEE S. KYLES,
4 KRISTIE M. BLOCH, MARK A. PRESTON, SHEENA K. ELLER, PATRICK D.
5 HUGHES, MARCUS S. HAWKINS, and WILLIAM H. CAMERON, shall forfeit
6 to the United States of America, any property constituting, or derived from,
7 proceeds obtained, directly or indirectly, as a result of such violation(s). The
8 property to be forfeited includes, but is not limited to, the following:
9

10 **MONEY JUDGMENT**

11 A sum of money in United States currency representing the amount
12 of proceeds obtained as a result of the bank fraud offense(s).

13 If any of the property described above, as a result of any act or omission of
14 the Defendants:

- 15 a. cannot be located upon the exercise of due diligence;
16 b. has been transferred or sold to, or deposited with, a third party;
17 c. has been placed beyond the jurisdiction of the court;
18 d. has been substantially diminished in value; or
19 e. has been commingled with other property which cannot be divided
20 without difficulty,

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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28
3 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 982(a)(2)(A) and 28 U.S.C. §
4 2461(c).

5

6 DATED this 21st day of September, 2022.



12 Vanessa Waldref
13 Vanessa R. Waldref
14 United States Attorney

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16 Earl A. Hicks
17 Earl A. Hicks
18 Assistant United States Attorney
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